

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MARY TROUPE, et al.

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:10cv00153-HTW-LRA

HALEY BARBOUR, et al.

DEFENDANT

CONSOLIDATED WITH

UNITED STATES OF AMERICA

V.

THE STATE OF MISSISSIPPI

STATE OF MISSISSIPPI'S INITIAL DISCLOSURES

The State of Mississippi makes its Initial Disclosures under FRCP 26(a)(1)(A) and Uniform Local Rule 26(a)(1)(A) as follows:

A. Individuals Likely to Have Discoverable Information. The name, address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

**Mississippi Department of Mental Health
239 North Lamar Street, Suite 1101
Jackson, Mississippi 39201
601-359-1288**

The individuals listed below may have discoverable information regarding the aspects of the State's mental health system that are placed at issue in Plaintiffs' Complaints:

1. Diana Mikula, Executive Director.
2. Steven Allen, Deputy Executive Director.
3. Dr. Robert Maddux, Medical Director for DMH and Clinical Director at MSH.

4. Kelly Breland, Bureau Director of Administration (Chief Financial Officer).
5. Jake Hutchins, Bureau Director of Community Services.
6. Marc Lewis, Bureau Director of Mental Health Programs.
7. Wendy Baily, Bureau Director of Outreach Planning and Development.
8. Denise Jones, Bureau Director of Information Technology (Chief Information Officer).
9. Shannon Rushton, Division Director of Licensure and Certification.
10. Randy Foster, Division Director of Incident Management.
11. Andrew Day, Division Director of Adult Community Mental Health Services.
12. Brent Hurley, Director of Crisis Response Services and Jail Diversion Activities.
13. Sherry Bouldin, Director of Recover and Resiliency.
14. Aurora Baugh, Director of Peer Support Specialist.
15. Veronica Vaughn, Director, Office of Consumer Support and Division of Community Living.
16. Molly Portera, Helpline Coordinator, Office of Consumer Support.
17. Eric Wilson, Project Specialist, Division of Community Living.
18. Sherry Holloway, Project Specialist, Division of Community Living.
19. George Harrison, DMH Board Member.
20. J. Richard Barry, DMH Board Chairman.
21. Amanda Griffin, DMH Board Member.
22. Dr. Jim Herzog, DMH Board Member.
23. Robert Landrum, DMH Board Member.
24. Dr. John Montgomery, DMH Board Member.
25. Teresa Mosley, DMH Board Member.

26. Dr. Sampat Shivangi, DMH Member.

**Mississippi Department of Mental Health
Division of Children and Youth Services**

1. Sandra Parks, Mental Health Division Director – Supervise and manage Division staff; develop, review and manage programmatic grants and RFPs; participate on required Interagency Councils; conduct certification/site visits; Support the implementation of EBP's through training and technical assistance; develop and apply for federal grant opportunities.
2. Monica Wilmoth, Division Director – Children/Youth Services liaison to all provider and programmatic certifications, site visits, and monitoring. Expertise areas include day treatment programs, MAP team data collection, and all certification/site visit documents and reports.
3. Dwayne Nelson, Mental Health Program Administrator II – Coordinates and oversees the Juvenile Outreach Program (JOP) including monitoring and data collection. Conducts certification/site visits.
4. Lynda Stewart, Division Director – Children/Youth State Mental Health Planner for the Community Mental Health Services Block Grant including the collection of survey data, developing annual reports, and submission of Block Grant into the required electronic system. Conducts certification/site visits.
5. Jackie Chatmon, Mental Health Program Administrator IV – State System of Care Director which oversees all System of Care (SOC) projects and programs; develop new grant proposals; submit bi-annual reports to SAMHSA; coordinates governance structure for SOC grantees; provides technical assistance to SOC projects across the State; and, coordinates all interagency partnerships related to SOC services.
6. Albertstein Johnson-Pickett, Division Director – Facilitates and Coordinates Cultural & Linguistic Competency (CLC) trainings, workgroups, technical assistance, plans, and related activities for DMH and providers. Conducts certification/site visits.
7. Misty Waldrop, Administrative Assistant VII – Assists with the management of all SOC projects including agendas and minutes of the SOC Council. Drafts and prepares reports for the Council; develops and designs social marketing tools for various programs; assists with the coordination of the Trauma Informed Care conference, Children's Mental Health Awareness Day and other events as needed.

8. Willis Garrison, Mental Health Administrator II – SOC grant funded position. Coordinates and evaluates all Trauma informed trainings and technical assistance to include the TF-CBT collaboratives, Trauma-informed care conference and other specialized requests for technical assistance. Conducts certification/site visits for all Children/Youth Services.
9. Carman Weaver, Administrative Assistant VI – Prepares and organizes grant files, maintains the Division's itinerary calendar, prepares minutes, agendas, letters, etc. for the State Mental Health Planning Council.

State Level Case Review Team

1. DMH members – Sandra Parks, Dwayne Nelson, and Lynda Stewart.
2. Mississippi Department of Child Protection Services – Brittany Brower, Cynthia Moore-Hardy, Julie Propst and Katrina Urbina.
3. Division of Medicaid – Felita Bell and Elizabeth Young.
4. DHS, Division of Youth Services – George Schmaus.
5. Families As Allies, Inc. – Henry Moore.
6. Attorney General's Office – Gloria Salters.
7. Optum Health Behavioral Solutions – Meredith Clemmons, Shira Brownell, and Dwyla Wilson.
8. Cenpatco/Magnolia Health – Amy Cobb, Jay Lewis, Shameka Lampkin, and Brenda Soto.
9. Centene Corp. /Magnolia Health – Allyson McDonnical, Christie Moody, Michael Todaro, and Sherry Messa.

Interagency System of Care Council

1. DMH, Division of Children & Youth – Sandra Parks.
2. DMH, Bureau of Alcohol & Drug Abuse Services – Pam Smith.
3. Division of Medicaid – Bonlitha Windham.
4. Families As Allies – Coreaner Price, Nikki Flippins, and Laura Smith.
5. DHS, Division of Youth Services – James Maccarone and Eileen Anderson.

6. Department of Rehabilitation – Faye Jordan and Lavonda Hart.
7. Attorney General’s Office – Patty Marshall.
8. Department of Child Protection Services – TBD (formerly Sandra McClendon; position not currently filled).
9. Community Counseling – Stephanie Taylor.
10. Department of Education, Special Education – TBD (formerly Susan Davis; position not currently filled).
11. Department of Education, Office of Compulsory School Attendance – Toni Kersh.

Private DMH Certified Providers of Children/Youth Services

1. Catholic Charities
200 North Congress St., Suite 100, Jackson, MS 39201
Amy Turner, Children’s Program Director (601-355-8634)
2. Canopy (formerly MS Children’s Home Services)
P.O. Box 1078, Jackson, MS 39205
Dr. John Damon, CEO (601-352-7784)
3. NAMI Mississippi
2618 Southerland St., Jackson, MS 39216
Tameka Tobias Smith, Director (601-899-9058)
4. Youth Villages
805 S. Wheatley St., Suite 240, Ridgeland, MS 39157
Amy Adams, Director of Programs (601-572-3727)

**North Mississippi State Hospital
1937 Briar Ridge Road
Tupelo, MS 38804
662-690-4200**

1. Paul A. Callens, Ph.D., Hospital Director. Provides oversight to all aspects of the overall function of the hospital.
2. Dr. Ken Lippincott, Clinical Director. Provides the overall clinical leadership for all clinical functions at the hospital.
3. Dr. Andrea Garrison, Senior Physician. Provides direct psychiatric care and oversight for a hospital unit.

4. Angela Orsborn and Dennis Rowland, Nurse Practitioners. Assist the senior physician in providing for both the psychiatric and medical care on their unit.
5. Lisa Roberts, Director of Nursing. Provides the supervision of all nurses and mental health technicians and provides clinical leadership for the hospital.
6. Carol Armstrong, Census Management Director. Reviews and screens all commitments to NMSH and schedules admissions, and is responsible for the medical records department.
7. Joe Rials, Fiscal Services Director. Responsible for the financial aspects of this hospital.
8. Helen Vance, Performance Improvement Director. Responsible for ensuring hospital resources (e.g., beds) are utilized to the maximum benefit.
9. Debra Wuichet, Director of Social Services. Supervises the social work department that is responsible for serving on the interdisciplinary treatment team and planning/coordinating discharge options for those being served.
10. Tiffany Tyne and Lynn Mitchell, Peer Bridgers. Responsible for working with individuals currently being served and helping them gain control of their mental health recovery across a continuum of services.
11. Dr. James Coniglio, Program Director. Dr. Coniglio works with the clinical team and is responsible for all aspects of clinical programming.

Mississippi State Hospital
3550 Highway 468 West (Post Office Box 157-A)
Whitfield, MS 39193
601-351-8000

1. James Chastain, FACHE, Director. Serves as the chief administrative officer directly responsible for the overall administrative and programmatic operation of the hospital.
2. Craig Kittrell, Assistant Director (Support Services). Assists the Program Director in the direction and supervision of the Hospital's operations, and supervises the work of the support services divisions.
3. Kristi Finehout, Assistant Director. Responsible for leading the hospital's Human Resource programs, and for the hospital's compliance with federal, state and agency rules, laws and regulations.

4. William Bullock, Assistant Director. Responsible for management and supervision of a licensed nursing care facility.
5. Dr. Robert Maddux, Clinical Director, Board Certified Psychiatrist. Responsible for supervising and directing the entire clinical program of MSH.
6. Jacquin Yates, Nurse Executive. Provides administrative direction of nursing practice and the delivery of nursing care provided in all care areas.
7. Kaye R. Myers RN, Director of Admissions. Reviews all court orders and screens to see if MSH has the appropriate services for each individual.
8. Alicia Harris, Fiscal Services Director. Directs, coordinates, and maintains fiscal activities of all departments.
9. Julie Johnson, BSN, RN, Director of Utilization Review. Supervises department responsible for contacting third party organizations and seeking reimbursement for hospital services provided, along with reviewing how hospital resources are used in the continuum of care.
10. Jacqueline A. Fleming, LCSW, Social Services Director. Provides clinical supervision to licensed social workers and oversees professional social work services at Mississippi State Hospital, Jaquith Nursing Home and Whitfield Medical Surgical Hospital.
11. Mara Jean Johnson, LCSW, Social Work Supervisor. Provides clinical supervision to licensed social workers who provide professional social work services to individuals admitted to and discharged from the Female Receiving Unit.
12. Andriena Fleming, LMSW, Social Work Supervisor. Provides clinical supervision to licensed social workers who provide professional social work services to individuals admitted to and discharged from the Chemical Dependency Unit.
13. Cernelia McAllister, LMSW, Social Work Supervisor. Provides clinical supervision to licensed social workers who provide professional social work services to individuals admitted to and discharged from the Male Receiving Unit.
14. Gerthania McGee, LMSW, Social Work Supervisor. Provides clinical supervision to licensed social workers who provide professional social work services to individuals who are admitted to and discharged from the Continued Treatment Units.
15. Carolyn Dart, Transition Coordinator. Serves as a resource person to the social work staff to see that each patient discharged from the hospital is

screened for eligibility for disability benefits, which will provide financial support for housing, transportation and living expenses.

16. Terry Busby, Transition Coordinator. Serves as a resource person to the social work staff to see that the healthcare information for each patient discharged is transmitted to the next level of care within the established timeframes.
17. Barbara Taylor, Transition Coordinator. Serves as a resource person to the social work staff to see that patients who are discharged into the community have the necessary resources for medications, appropriate housing, and aftercare.
18. Irma Stewart, Transition Coordinator, Mississippi State Hospital. Serves as a resource person to the social work staff to see that patients discharged into the community have financial benefits from SSA disability and the ability to obtain medications through a prescription drug program.
19. Charlotte Miley, LMSW, Social Work Supervisor. Provides clinical supervision to licensed social workers who provide professional social work services to individuals who are admitted to and discharged from the Child and Adolescent Units.
20. Psychiatrists and Primary Care Physicians:

Senior Physicians:

Craig Escude
Andrea Prince
Lisa Stone
Steve Shoop
Zinat Khandekar
Vincent Herrin
Edward Brewer
Timothy Shumaker
William Coughlin
Susan Taylor
Teresa McKetney
Suzanne Senter
Jason Taylor

Psychiatrists:

Karen Holloway
Robert Maddux
Sharon Martin
Paul McGinnis
Reb McMichael

Maria Scarborough
Wayne Smith
Thomas Recore
Chasity Torrence
Rosalie Casano
Kirtida Desai
Dirk Dhossche

Consultant – Psychiatrist:

Richard Aubert

21. Nurse Practitioners - Psychiatric Nurse Practitioners and Family Nurse Practitioners:

Psychiatric Nurse Practitioners: Collaborates with psychiatrists to admit patients, diagnose patients, prescribe medications, develop interdisciplinary treatment plans, co-manage the clinical care of patients, participate in interdisciplinary treatment team meetings, collaborate with social services for discharge and transition plans, and conduct family conferences.

Family Nurse Practitioners: Collaborates with family practice physicians to provide general medical care to patients, perform admission and annual physical exams, diagnosis and manage medical conditions, prescribe medications, and order labs and x-rays as needed.

Nurse Practitioners:

Elizabeth Bragg
Shannon Dorris
Megan Slade
Sarah Marshall
Sandra Wilson
Amanda Downard

Psychiatric Nurse Practitioners:

Raymundo Trinanés
Laura Johnson
Debra Black-Bell
Jackie Dyess
Laporshia McBeth
Arlen Cooper
Shonna Davis
Billy Walton
Clint Trest
Sarah Leath

Virginia Lewis

South Mississippi State Hospital
823 Highway 589
Purvis, MS 39475
601-794-0100

1. Clint Ashley, Director. Oversees all services, administrative and clinical at SMSH.
2. Roy Reeves, DO, Clinical Director. Formulates, directs and controls the clinical operations.
3. J. Allen Harris, MD and J. Christian (Chris) Lamousin, MD, Physicians. Provide medical assessment and care for adults diagnosed with mental illness, and leadership for a treatment team in the development of treatment plans.
4. Carla Whitfield, FNP-BC, Nurse Practitioner. Responsible for complete history and physicals and discharge summaries, and provides Medical Management.
5. April Holder, MSN, Nurse Chief. Supervises the nursing staff and serves as the administrative nurse consultant to the Hospital Director and the Clinical Director for SMSH.
6. Janet Rascoe, Admission Director. Plans, directs, and supervises the total management of and responsibility for the development and maintenance of health information systems, including medical records, dictation/transcription, census management, and admissions.
7. M. Andrew (Andy) Tucker, Fiscal Services Director. Prepares the facility budget request; approves and monitors expenditures; and supervises facility accounts, business activities, and other fiscal management matters. Supervises property inventory and accountability; food service operation; contracts management; physical plant management; patient billing and reimbursement, purchasing and accounts payable.
8. Dawn Dobson, AND, Utilization Review Director. Conducts Utilization Review activities of certifying/reviewing admissions and concurrently reviewing length of stay. Coordinates weekly utilization review committee meetings.
9. Connie Regan, LMSW, Social Work Director. Provides professional social services to patients admitted to an inpatient psychiatric acute care unit.

10. Cindy Hyden, Mary Adams, and Helen Little, Discharge/Transition Coordinators. Provide professional social services to patients admitted to an inpatient psychiatric acute care unit, and social and transitional services and discharge planning.
11. Amanda Clement and David Connell, Peer Support Specialists. Conduct education groups with patients, serves as an intermediary between staff and patients, and are advocates for patients.
12. Betty Entrekin, MSN, Performance Improvement Coordinator. Provides coordination of hospital-wide performance improvement plan, coordinates accreditation activities, and compliance with regulatory standards.

**East Mississippi State Hospital
1818 College Drive
Meridian, MS 39307
601-581-7600**

1. Charles A. Carlisle, Director. Information concerning administrative policies and procedures, rules and regulations and oversight of the hospital operations.
2. Christopher Barnes, Assistant Director. Information regarding administrative policies, procedures, rules and regulations of the hospital.
3. Dr. Grace Kelly, Clinical Director. Information regarding psychiatric and medical policies and procedures, regulations and bylaws of the hospital.
4. Physicians – Information concerning admissions, treatment and discharge of patients:

Dr. Ruben Cruz
Dr. Maxle Gordon
Dr. Pacifico Ongkingco
Dr. Shashidhar Shettar
Dr. Nunlion Thomas
Dr. Rolanda Abangan
Dr. Jason Farrar
Dr. Rafael Florez
Dr. Rosalyn Gambrell
Dr. Stephen Tramill

5. Nurse Practitioners – Information concerning admissions, treatment and discharge of patients:

Teresa Alexander
Keri Barr
Courtney Bennett

Rebecca Blount
Susan Bobo
Tina Clearman
Terrah Conerly
Mary Ann Howell
Kristin Kerley
Wanda Lloyd
Roshundia McKenzie
Daniel Munn
Rolando Pace
Brenda Phillips
Janet Pugh
Alvin Ricks
LaSaundra Roberts
Bridget Smith
Mary Terri Smith
Joan Speed
Pamela Watkins

6. Melissa Brewster, Director of Nursing. Information regarding nursing policies and procedures, training and competency requirements for the hospital.
7. Lynn Garrett, Admission Director. Information regarding commitments and admissions to the hospital.
8. Geri Doggett, Fiscal Services Director. Information regarding resource management, accounts receivable and payable, and audit functions for the hospital.
9. Yolanda McDade, Utilization Review Director. Information regarding compliance of criteria required for admission and continued care.
10. Sheila Newbaker, Social Work Director. Information regarding social work policies and procedures, training, and competency requirements for the hospital.
11. Christine Brown, Discharge Coordinator. Information regarding discharge policies and procedures.

Mississippi Department of Medicaid
550 High Street, Suite 1000
Jackson, MS 39202
601-359-6050

1. Bonlitha Windham, Office Director of Mental Health Programs.
2. Dorthy Young, Deputy Administrator for Health Services.

3. Kim Sartin-Holloway, Division Director, Office of Mental Health Programs.
4. Jennifer Grant, Bureau Director, Office of Medical Services.
5. Jennifer Fulcher, Office Director of Community-Based Services.
6. Kristi Plotner. Currently with the Division of Family and Child Services as the Deputy Commissioner for Child Protective Services, but formerly worked on *Olmstead* issues with DOM.

Specialized Treatment Facility (STF)
14426 James Bond Road
Gulfport, Mississippi 39503
228-328-6000

1. Anastasia “Stacy” G. Miller, Program Director – Writes/implements/enforces policies and procedures; participates in weekly DMH Census committee; participates on the weekly admissions referral/approval committee; participates in daily clinical Stand-Up meetings; signs court discharge documents and approves resident transfers. Responsible for overall program management, specifically fiscal and administrative support of the clinical program.
2. Charles Harris, Ph.D., Clinical Director – Licensed-clinical psychologist who conducts psychological tests, participates on the weekly admissions referral/approval committee; supervises and provides clinical supervision to all resident Therapists; participates in weekly Treatment Team meetings and daily clinical Stand-Up meetings; and responsible for behavioral system and evidenced based practices. Responsible for clinical services and implementation of resident treatment.
3. Richard Kutner, M.D., Child and Adolescent Psychiatrist – Part-time contract worker who serves as the Medical Director and APRN Collaborating Physician, coordinates medical services and directs resident treatment including approvals for admissions and discharges.
4. Steven Schepens, M.D., Family Practitioner – Part-time independent contract physician who serves as the community physician who works on-call to provide medical care 24-hours a day and works on-site to conduct physical exams upon admission.
5. Jimmy Dimitriades, M.D., Family Practitioner – Part-time independent contract physician who serves as the community physician who works on-call to provide medical care 24-hours a day and works on-site to conduct physical exams upon admission.

6. Scott Turner, APRN, Psychiatric Nurse Practitioner – Recommends referral approvals and approves discharges, participates in weekly Treatment Team, participates in daily clinical Stand-Up meetings, conducts medication management and face-to-face sessions with each resident each week.
7. Stephanie May, DON, Director of Nursing – Recommends referral approvals/discharges, participates in daily clinical Stand-Up meetings and participates in weekly Treatment Team.
8. Shannon Bush, Admission Director/Utilization Review Director/Transition Coordinator – Reviews and screens all court orders and commitments, schedules admissions; participates in weekly Treatment Team, participates in daily clinical Stand-Up meetings, monitors census utilization and transition.
9. Tanya Goolsby, Fiscal Services Director – Monitors and prepares reports/budget for program income and expenses, and participates in various administrative committees.
10. Valerie Joiner, LCSW, Social Work Director and Assistant Clinical Director – Participates on the weekly admissions referral/approval committee; supervises and provides clinical supervision to social workers; participates in weekly Treatment Team meetings and daily clinical Stand-Up meetings; alcohol/drug director; assigned as therapist to caseload and writes treatment plans.
11. Sandy Holbrook, School Principal – Participates on the weekly admissions referral/approval committee, writes treatment plans and participates daily clinical Stand-Up meetings and in weekly treatment team meetings, writes and implements special education, enrolls students into academic education 6th – 12th grades, occupational diploma track, life skills track, or the GED program. Enrolls students into colleges and assists with preparation of grant documents for federal/state tuition assistance.
12. Brian Kates Performance Improvement Coordinator – Participates on the weekly admissions referral/approval committee, monitors program administrative and clinical performance and adherence to licensing regulators, participates in daily clinical Stand-Up meeting, conducts discharge follow-up, and gathers strategic plan data.
13. Deborah Crosby, Treatment Team Coordinator – Gathers clinical staff (therapists, nurses, recreation specialists, teachers, speech pathologists, nutritionists, etc.) portions towards treatment/transition plans, schedules treatment team and writes minutes.
14. Therapists: Each Master Level Therapist is assigned to a resident to provide therapy (individual, group, and family), writes treatment plans,

communicates with families/courts/schools/etc. and participates in daily clinical Stand-Up meetings and weekly Treatment Team. Therapists are Elena Fairley, Katrina Griffith, Kawanna Joseph, Michelle Rivers, Destinie Weems, and Eugene Young.

Other Individuals:

1. Mary Simmons
Director, Open Doors Homeless Coalition
11975 Seaway Road, Suite B220
Gulfport, Mississippi 39503
228-604-2048
2. Ledger Parker, Director
Mississippi United to End Homelessness
201 W. Capitol St. #800
Jackson, MS 39201
3. Tameka Tobias Smith NAMI Mississippi
618 Southerland Street, Suite 100
Jackson, MS 39216
601-899-9058
4. Kay Denault
Mental Health Association of Mississippi in Harrison County
4803 Harrison Circle
Gulfport, MS 39507
228-864-6247
5. Matt Nalker
ARC
704 North President Street Jackson, MS 39202
601-355-0220

B. Documents That May Support Claims or Defenses. A description by category of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

DMH Documents:

1. DMH Annual Reports.
2. Strategic Planning Documents and Mid-year Progress Reports.
3. Legislative Budget Requests.

4. Funding Opportunity Announcements for PACT, supported employment and Mobile Crisis Teams.
5. Progress Updates.
6. DMH Operational Standards and Record Guide.
7. Interagency Agreements.
8. Strategic Planning and Best Practices Report.
9. TAC Housing Report.
10. Service Support and Provider documents contained on the DMH website.
11. Request for Proposals for State and Federal CMHS Block Grant funds: MAP Teams, NAVIGATE, Juvenile Outreach Program, Therapeutic Group Home/Foster Care, Family Education, etc.
12. Federal System of Care grant progress reports: MTOP and Project XP.
13. State Level Case Review Team documents.
14. Programmatic and data reports for MAP Teams, TGHs, TFC, JOP, Wraparound Facilitation, NAVIGATE, and Day Treatment.
15. Interagency Coordinating Council for Children/Youth and Interagency System of Care Council meeting documents.

NMSH Documents:

1. Medical Records.
2. Strategic Plan and related documents.
3. Annual Report and related documents.
4. Policies and procedures and related documents.
5. Mississippi Department of Health – Standards of Operation for Psychiatric Hospitals.
6. The Joint Commission Standards.
7. CMS Standards.

MSH Documents:

1. Medical Records.
2. MSH Strategic Plan FY2016.
3. MSH Annual Report FY 2017.
4. MSH Policies and procedures, such as:
 - Utilization Review Committee (MSH Policy 000-24 Attachment F).
 - Discharge of Patient (MSH Policy 210-14).
 - Discharge Advisory Committee (MSH Policy 000-24 ATT G).
 - Notification of Hospital Discharge Appeal (MSH Policy 280-01).
 - Assessment of Patients (MSH Policy 210-20).
 - Oak Circle Admissions (MSH Policy 110-01).
 - Adult Psychiatric Receiving Service Admissions (MSH Policy 110-05).
 - Rights of Patients (MSH Policy 161-04).
 - Patient Passes, Pass Medications (MSH Policy 210-36).
 - Social Services Policy 280-300 (Discharge Planning Coordination).
5. MSH Program Manuals.
6. CMS Standards.

SMSH Documents:

1. Medical Records.
2. Strategic Plan and related documents.
3. Annual Report and related documents.
4. Policies and procedures and related documents.
5. Performance improvement monthly and yearly reports.
6. Standards, Accreditation and Compliance Committee Meeting Minutes.
7. CMS Standards.

EMSH Documents:

1. Medical Records
2. Strategic Plan and related documents
3. Annual Report and related documents
4. Policies and procedures and related documents
5. Mississippi Department of Health Standards
6. Joint Commission Standards
7. CMS Standards

DOM Documents:

1. Policy:
 - Administrative Code.
 - MS State Plan and all Plan Amendments (SPAs).
 - Provider policy manuals.
 - Interagency Agreements with DMH.
 - Assessment/screening documents.
2. Reports:
 - Prior Authorization/medical necessity reports.
 - Incident Reports and documentation.
 - Program Integrity reports, if any.
 - MSCAN documents.
3. Claims:
 - FFS claims.
 - MSCAN encounter documents.
4. Provider and Beneficiary Outreach:
 - Provider bulletins and other training/education documents.
 - ICCY/ISOC/SICC documents.
5. Provider Enrollment Records:
 - Provider applications and disclosures.
 - MSCAN network documents.

STF Documents:

1. Medical Records.
2. Strategic Plan and related documents.
3. Policies and procedures and related documents (specifically regarding admissions/discharge criteria).
4. Admissions Screening Review Committee Minutes and/or Denial Reports.
5. Treatment Team Minutes.
6. School Records.
7. Management Meeting Committee Reports/Minutes.
8. Performance Improvement Committee Reports/Minutes.

C. Computation of Damages. The State is not claiming damages in this action.

D. Insurance Agreements. Not applicable.

THIS, the 28th day of December, 2016.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: 

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Attorneys for the State of Mississippi

CERTIFICATE OF SERVICE

I certify that on December 28, 2016, a copy of this document was sent to the following
counsel of record by U.S. mail:

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